

Jones

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GEOFFREY VARGA and WILLIAM
CLEGHORN, solely in their capacity as Joint
Voluntary Liquidators of Bear Stearns High-Grade
Structured Credit Strategies (Overseas) Ltd. and
Bear Stearns High-Grade Structured Credit
Strategies Enhanced Leverage (Overseas) Ltd.,
and not individually,

Plaintiffs,

- against -

BEAR STEARNS ASSET MANAGEMENT
INC., THE BEAR STEARNS COMPANIES,
INC., BEAR, STEARNS & CO. INC., RALPH
CIOFFI, MATTHEW TANNIN, RAY
MCGARRIGAL, and DELOITTE & TOUCHE
LLP,

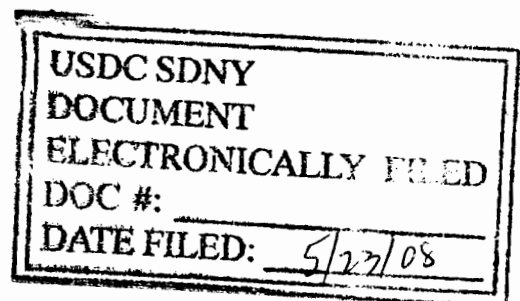
Defendants.

08-CV-03397 (BSJ)

ECF CASE

**STIPULATION AND ORDER
DIRECTING FILING OF
DOCUMENTS UNDER SEAL**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs,
defendants Bear Stearns Asset Management Inc., The Bear Stearns Companies, Inc., Bear
Stearns and Co. Inc (together, the "Bear Stearns Defendants") and defendants Ralph Cioffi,
Matthew Tannin, Ray McGarrigal and Deloitte & Touche LLP that Exhibits 2 and 3 to the
Affidavit of Max R. Shulman, dated May 6, 2008 and filed May 7, 2008, contain confidential
client information and should therefore be filed under seal.



Dated: May 12, 2008

CRAVATH, SWAINE & MOORE LLP,

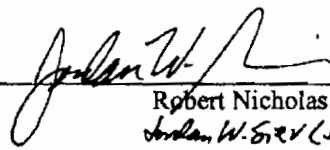
by 
Max R. Shulman

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Attorneys for Defendant
Deloitte & Touche LLP

Dated: May 16, 2008

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by 
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(212) 521-5400
rnicholas@reedsmith.com

Dated: May ___, 2008

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by _____
Marc A. Weinstein

Attorneys for Defendant Ralph Cioffi
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Page 2 of 3

FROM CRAVATH, SWAIN & MOORE LLP

MON 5/12/08 15:27/ET 15:20/NO.4364984650 P. 5

Dated: May 12, 2008

CRAVATH, SWAIN & MOORE LLP,

by Max R. Shulman
Max R. Shulman

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mshulman@cravath.com

Attorneys for Defendant
Deloitte & Touche LLP

Dated: May __, 2008

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by _____
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nicholas@reedsmith.com

Dated: May 14, 2008

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by Mark A. Weinstein
Mark A. Weinstein

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(212) 877-6000

2

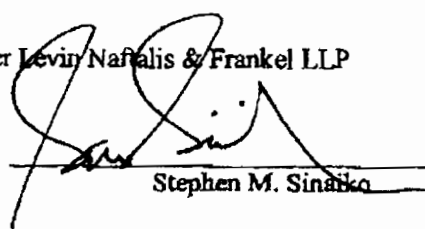
FROM CRAVATH SWAIN & MOORE LLP

(MON) 5.12.08 15:24/ST. 15:22/NO. 4864994453 P 7

Dated: May 12, 2008

Kramer Levin Naftalis & Frankel LLP

by


Stephen M. Sinanko

Attorneys for the Bear Stearns Defendants
1177 Avenue of the Americas
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(212) 715-9100

Dated: May __, 2008

Driscoll & Redlich

by

Catherine L. Redlich

Attorneys for Defendant Raymond McGarrigal
521 Fifth Avenue, Suite 3300
New York, NY 10175
(212) 986-4030

Dated: May __, 2008

Brune & Richard LLP

by

Theresa Trzaskoma

Attorneys for Defendant Matthew Tannin
80 Broad Street
New York, NY 10004
(212) 668-1900

SO ORDERED this ____ day of May, 2008.

Hon. Barbara S. Jones, U.S.D.J.

Dated: May __, 2008

Kramer Levin Naftalis & Frankel LLP

by

Stephen M. Sinaiko

Attorneys for the Bear Stearns Defendants
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Dated: May 20, 2008

Driscoll & Redlich

by

Catherine L. Redlich
Catherine L. Redlich

Attorneys for Defendant Raymond McGarrigal
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New York, NY 10175
(212) 986-4030

Dated: May __, 2008

Brune & Richard LLP

by

Theresa Trzaskoma

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SO ORDERED this ____ day of May, 2008.

Hon. Barbara S. Jones, U.S.D.J.

FROM CRAVATH SWAIN & MOORE LLP

(MON) 5.12'08 13:31/ST. 13:20/NO. 4864994450 P 7

Dated: May __, 2008

Kramer Levin Naftalis & Frankel LLP

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Dated: May __, 2008

Driscoll & Redlich

by

Catherine L. Redlich

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(212) 986-4030

Dated: May 20, 2008

Brune & Richard LLP

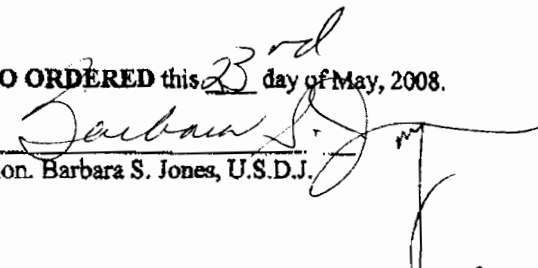
by



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SO ORDERED this 23rd day of May, 2008.



Hon. Barbara S. Jones, U.S.D.J.